IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

JOI ELISABETH HEBRON	§	
Plaintiff,	§	
	§	
ν.	§	Civil Action No.: 5:25-CV-00800-JKP-HJB
	§	
CITY OF SAN ANTONIO	§	
Defendant	§	

JOINT REPORT ON ALTERNATIVE DISPUTE RESOLUTION

TO THE HONORABLE UNITED STATES DISTRICT COURT JUDGE:

NOW COME Plaintiff, Joi Elisabeth Hebron, and Defendant, City of San Antonio, and files this ADR Report. The parties will respectfully show the following:

- 1. Pursuant to the Court's scheduling order and Local Rule CV-88, the Parties submit this Alternative Dispute Resolution (ADR) report. The Parties represent to the court that discovery will be needed before Plaintiff and Defendant would be in a position to proceed to ADR for this case. Therefore, ADR would not be appropriate at this time.
- 2. Plaintiff's counsel of record, Markes Kirkwood, is responsible for settlement negotiations on behalf of the Plaintiff. Mr. Kirkwood has authority to settle all claims in consultation with Plaintiff JOI ELISABETH HEBRON. If any settlement negotiations are to be entered into in the future, Assistant City Attorney Elizabeth Guerrero-Southard is the person primarily responsible for those discussions on behalf of Defendant COSA. No settlement discussions have occurred in this case. Defendant Robert Garcia's counsel of record, Mark Kosanovich, is responsible for settlement negotiations on behalf of the Defendant. Mr. Kosanovich has authority to settle all claims in consultation with Defendant ROBERT GARCIA.

3. The Parties agree that the preferred method of ADR appropriate for this case is mediation. The parties have agreed to Phylis J. Speedlin as mediator. Further, the Parties agree that the fees charged by the agreed upon mediator shall be shared equally by the Parties. The Parties shall cause the selected mediator to submit a notice of the outcome of the mediation of this cause of action in compliance with Rule CV-88(g).

RESPECTFULLY SUBMITTED BY:

LAW OFFICES OF MARKES E. KIRKWOOD P.L.L.C.

/s/ Markes E. Kirkwood

Markes E. Kirkwood

LAW OFFICES OF MARKES E. KIRKWOOD P.L.L.C.

2600 McCullough Avenue

San Antonio, Texas 78212

(210) 532-1000; Telephone

(210) 572-7575; Facsimile

Email: <u>kirkwoodmarkes@yahoo.com</u> **ATTORNEYS FOR PLAINTIFF JOI ELISABETH HEBRON**

FITZPATRICK & KOSANOVICH, P.C.

/s/ Mark Kosanovich

Mark Kosanovich

FITZPATRICK & KOSANOVICH, P.C.

P.O. Box 831121

San Antonio, TX 78283

(210) 408-6793; Telephone

(210) 408-6797; Facsimile

Email: mk@fitzkoslaw.com

ATTORNEY FOR DEFENDANT

ROBERT GARCIA

OFFICE OF THE CITY ATTORNEY

/s/ Elizabeth Guerrero-Southard

Elizabeth Guerrero-Southard

SBN: 24032376

203 S. St. Mary's Street, 2nd Floor

San Antonio, Texas 78205 (210) 207-2108; Telephone (210) 207-4357; Facsimile

Email: Elizabeth.guerrero-southard@sanantonio.gov

ATTORNEYS FOR DEFENDANT

CITY OF SAN ANTONIO